

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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CYTOLOGIX CORPORATION,

Plaintiff,

v.

VENTANA MEDICAL SYSTEMS, Inc.,

Defendant.

U.S. DISTRICT COURT
DISTRICT OF MASS.

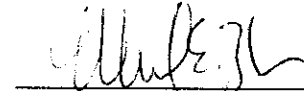
Civil Action No. 04-11783 (NG)

CYTOLOGIX CORPORATION'S MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, the plaintiff CytoLogix Corporation ("CytoLogix") hereby moves for an order compelling the defendant Ventana Medical Systems, Inc. ("Ventana") to respond to outstanding discovery requests subject to a protective order, a proposed copy of which is attached hereto.

Dated: March 15, 2005

By:



Michael Zeliger (BBO # 633654)

FISH & RICHARDSON, P.C.

225 Franklin Street

Boston, MA 02110-2804

Telephone: (617) 542-5070

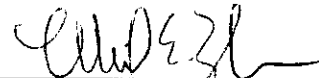
Facsimile: (617) 542-8906

Attorney for Plaintiff

CYTOLOGIX CORPORATION

LOCAL RULE 7.1(A)(2) CERTIFICATION

The counsel for plaintiff hereby certifies that good faith efforts have been made to confer with opposing counsel concerning the issues raised in this motion. The parties met and conferred on multiple occasions and agreed to all terms of a protective order except that, despite diligent effort, no agreement could be reached regarding the access of defendant's in-house counsel to plaintiff's confidential documents. Repeated efforts to resolve this last issue have been unsuccessful, necessitating the filing of this motion.



Michael Zeliger

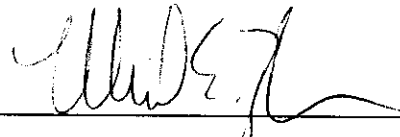
CERTIFICATE OF SERVICE

I certify that on March 15, 2005, I caused a true and correct copy of the foregoing
PLAINTIFF CYTOLOGIX MOTION FOR PROTECTIVE ORDER to be served to the
following:

BY FEDERAL EXPRESS

Roger Chin
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304

*Attorneys for Defendant
Ventana Medical Systems, Inc.*



Michael Zeliger